

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

TRAIS FERNANDEZ HAIRE,

Plaintiff,

v.

Case No. 23-CV-0912

MATTHEW BURNS, et al.,

Defendants.

**MOTION TO WITHDRAW AS COUNSEL AND REVOKE ACCEPTANCE OF
SERVICE FOR RODNEY REYNOLDS**

The undersigned counsel, Wisconsin Attorney General Joshua L. Kaul and Assistant Attorneys General Michael Emer and Brandon Flugaur, respectfully move to withdraw as counsel for Rodney Rodney , as well as revoke acceptance of service on their behalf. A court may allow counsel to withdraw if “good cause for withdrawal exists.” Wisc. Sup. Ct. R. 20:1.16; *Bey v. Haines*, 802 F. App'x 194, 198, 2020 WL 413322 (7th Cir. 2020) (“[M]ost federal courts use the ethical rules of the states in which they sit,’ ...and the Western District of Wisconsin is no exception.”) (internal quoted source omitted).

The Complaint in this matter did not identify Defendant Reynolds by first name. (Dkt. 1). The Department of Justice accepted service on behalf of Rodney Reynolds. (Dkt. 6.) After filing the acceptance of service, further review and investigation suggested that Plaintiff's Complaint implicates John Reynolds rather

than Rodney Reynolds. An Amended Acceptance of Service was filed accepting service for John Reynolds. (Dkt. 9).

Accordingly, good cause exists for withdrawal and revocation of the acceptance of service on behalf of Rodney Reynolds in this case.

Dated: October 13, 2023

Respectfully submitted,

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